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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Michele Leuthauser

Plaintiff

Case 20-CV-479 (JCM) (VCF)

V.

United States of America
- and Anita Serrano

Defendants

DECLARATION OF JONATHAN CORBETT

- I, Jonathan Corbett, declare the following under penalty of perjury:
- 1. My name is Jonathan Corbett and I am counsel for Plaintiff in this case.
- 2. I received the "Notice of Issuance of Subpoenas" described within this motion to quash from attorneys for defendants via e-mail on January 19th, 2020.
- 3. Defendants had never expressed their intent to issue such subpoenas to me before this notice.
- 4. I replied to that e-mail the next day stating that we object to the request for "entire employment file[s]" on the basis that such subpoenas are "entirely overbroad."
- 5. The e-mail demanded the withdrawal of the subpoenas and continued discussion, and indicated that a motion to quash would be filed absent prompt reply..
- 6. I have received no reply to my objection as of today at 12:00 AM PT.

Respectfully submitted, Dated: Las Vegas, NV January 25th, 2021 /s/Jonathan Corbett Jonathan Corbett, Esq. (CA Bar #325608) Attorney for Michele Leuthauser 958 N. Western Ave. #765 Hollywood, CA 90029 Phone: (310) 684-3870 FAX: (310) 675-7080 E-mail: jon@corbettrights.com